

The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

STATE OF WASHINGTON,

Plaintiff,

v.

THE GEO GROUP, INC.,

Defendant.

CIVIL ACTION NO. 3:17-cv-05806-RJB

UGOCHUKWU GOODLUCK
NWAUZOR, FERNANDO AGUIRRE-
URBINA, individually and on behalf of
all those similarly situated,

Plaintiffs,

v.

THE GEO GROUP, INC., a Florida
corporation,

Defendant.

CIVIL ACTION NO. 17-cv-05769-
RJB

PLAINTIFFS' JOINTLY PROPOSED
VOIR DIRE

1 The State of Washington and Plaintiffs Ugochukwu Goodluck Nwauzor and Fernando
2 Aguirre-Urbina respectfully propose that the Court ask the following questions of the jury:

3 **Topic 1: General Questions**

- 4
- 5 1. Have you or a close friend or family member ever been inside the Northwest Detention
6 Center (also known as the Northwest ICE Processing Center) in Tacoma, Washington,
7 either because you or your family or your friend worked there, were detained there, or
8 for any other reason?
 - 9 2. Does any member of the jury panel know another panel member?
 - 10 3. Does anyone need an accommodation to help you listen or sit comfortably during the
11 trial?
 - 12 4. Has anyone ever been involved as a party in a legal dispute – meaning a claim or a lawsuit
13 filed by you or against you?

14 **Topic 2: Employment Background**

- 15
- 16 5. Do you or anyone in your household own a business?
 - 17 a. If yes, did the business hire employees?
 - 18 6. Have you or anyone in your household ever worked in law enforcement?
 - 19 7. Have you or anyone in your household served in the military?
 - 20 8. Have you or anyone in your household ever supervised employees as part of their job?
 - 21 9. Have you or anyone in your household ever hired employees as part of their job?
 - 22 10. Do you or anyone in your household have education, training, or experience in human
23 resource management?
 - 24 11. Have you or anyone in your household ever worked a minimum wage job?
- 25
26

1 12. Have you or a close family member ever worked for a temporary agency?

2 13. Have you or a close family member ever worked for a restaurant or catering company?

3 14. Have you or a close family member ever worked as a janitor or housekeeper?

4 **Topic 3: Minimum Wage**

5 15. Do you think employers should be required to pay employees a minimum wage?

6 16. In 2016, Washington voters passed a new law that increased the state minimum wage to
7 \$13.50 as of January 1, 2020. Do you believe this increase in the minimum wage was:

8 a. Too high?

9 b. Too low?

10 c. Appropriate?

11 17. Do you believe undocumented immigrants who work in Washington should be paid less
12 than the minimum wage?

13 **Topic 4: Role of the State**

14 18. One of the cases here is a civil enforcement action brought by the State of Washington.
15 Has anyone had experience with, or heard of, Washington conducting a civil enforcement
16 action to protect Washington residents?

17 a. What was the matter and what did you think about it?

18 19. Do you think the State of Washington should be enforcing the state's minimum wage
19 laws?

20 20. Some people think that the State does too much meddling in the affairs of private business.
21 Does anyone have that view—that Washington should stay out of an employer's way?

Topic 5: Immigration

21. This case will involve witnesses who are/were detained while the United States determined their immigration status. Do you have an opinion regarding U.S. immigration laws that would make it difficult for you to be objective in this case?

22. Do any of you have a close relationship with someone who immigrated to this country?

23. This case will involve witnesses who may speak languages other than English. Can you speak a language other than English?

24. Have you ever had to use an interpreter to speak with another person?

a. If so, what did you learn from the experience of using an interpreter to speak with someone else?

Topic 7: Closing Questions

25. Does anyone have any specific beliefs or opinions about immigrants and noncitizens that would make it difficult for you to be fair and impartial in this case, which involves immigrants and noncitizens?

26. Having heard the questions put to you by the court, does any other reason suggest itself to you as to why you could not sit on this jury and render a fair verdict based on the evidence presented to you and in the context of the court's instructions to you on the law?

//

//

//

DATED this 24th day of April 2020.

SCHROETER GOLDMARK & BENDER

s/ Jamal N. Whitehead

Adam J. Berger, WSBA #20714
Lindsay L. Halm, WSBA #37141
Jamal N. Whitehead, WSBA #39818
Rebecca J. Roe, WSBA #7560
810 Third Avenue, Suite 500
Seattle, WA 98104
Tel: (206) 622-8000
berger@sgb-law.com
halm@sgb-law.com
whitehead@sgb-law.com

THE LAW OFFICE OF

R. ANDREW FREE

R. Andrew Free (*Pro Hac Vice*)

P.O. Box 90568

Nashville, TN 37209

Tel: (844) 321-3221

andrew@immigrantcivilrights.com

OPEN SKY LAW, PLLC

Devin T. Theriot-Orr, WSBA # 33995

20415 – 72nd Avenue S, Suite 110

Kent, WA 98032

Tel: (206) 962-5052

devin@opensky.law

MENTER IMMIGRATION LAW,
PLLC

Meena Menter, WSBA # 31870

8201 – 164th Avenue NE, Suite 200

Redmond, WA 98052

Tel: (206) 419-7332

meena@meenamenter.com

Class Counsel

ROBERT FERGUSON

Attorney General of Washington

s/ Marsha Chien

MARSHA CHIEN, WSBA No. 47020

ANDREA BRENNEKE, WSBA No. 22027

LANE POLOZOLA, WSBA No. 50138

PATRICIO A. MARQUEZ, WSBA No. 47693

Assistant Attorneys General

Office of the Attorney General

800 Fifth Avenue, Suite 2000

Seattle, WA 98104

(206) 464-7744

marsha.chien@atg.wa.gov

andrea.brenneke@atg.wa.gov

lane.polozola@atg.wa.gov

patricio.marquez@atg.wa.gov

Attorneys for Plaintiff State of Washington

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically filed with the United States District Court using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Dated this 24th day of April 2020, in Seattle, Washington.



Caitilin Hall
Legal Assistant